

" " " "
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
" " " "

CURTIS M. COLLINS
PLAINTIFF,

C.A. NO. 05-739-SLR

V.

JURY TRIAL DEMAND

WARDEN RICK KEARNEY, ET AL.,

DEFENDANTS,

MOTION TO EXTEND DEAD-
LINE FOR COMPLETION OF
* DISCOVERY *

COMES NOW THE PLAINTIFF CURTIS COLLINS
IN THE ABOVE MOTION TO EXTEND DEADLINE!
THAT DEFENDANTS COUNSEL HELD A
DEPOSITION DISCOVERY ON AUGUST 17, 2006
8TH DAYS BEFORE THE AGREED UPON AUGUST
25, 2006 DEAD LINE THAT BECAUSE PLAINTIFF
HAS NOT BEEN PROVIDED TRANSCRIPTS OF
THE AUG 17, 2006 DEFENDANTS DISCOVERY HEAR-
ING BEFORE THE AUG 25, 2006 DEAD LINE,
PLAINTIFF HAS NOT BEEN GIVEN THE OPP-
ORTUNITY TO CONTEST AND REFUTE THE
POSSIBLE INCORRECT ANSWERS OF THAT
DEPOSITION WHEREAS PLAINTIFF REQUESTS
THIS HONORABLE COURT TO EXTEND THE AUG
25, 2006 DEADLINE, 60 DAYS TO ALLOW DEFEN-
DANTS COUNSEL TIME TO SEND TRANSCRIPTS
TO PLAINTIFF WHICH WOULD ALLOW PLA-
INTIFF AN OPPORTUNITY TO CORRECT ->

2006 AUG 31

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DISTRICT OF DELAWARE

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ANY POSSIBLE MISREPRESENTATION
CONTAINED IN THAT TRANSCRIPT, FURTHERMORE
PLAINTIFF REQUESTS THIS COURT TO EXTEND
THE AUG 25, 2006 DEADLINE TO OCT 25, 2006

— SINCERELY
* Curtis Collins

DATE 8-27-06

* CERTIFICATE OF SERVICE *

I, CURTIS M COLLINS
hereby CERTIFY That ON
THIS 29-06 DAY
OF 8, I HAVE HANDLED THIS
MOTION TO EXTEND DEAD
LINE FOR COMPLETION OF

* DISCOVERY *
TO A DEL CORRECTION CENTER
PRISON GUARD TO PLACE SAID
MOTION IN D.C.C UNITED STATE
MAIL SYSTEM IN A PRE-PAID
ENVELOPE TO BE SENT TO THE
DEL DISTRICT COURT AND

ERIKA V. TROSS'ESQ.

(ID # 4506)

DEPUTY ATT' GENERAL

DEPT. OF JUSTICE

CARVEL STATE OFFICE BLDG

820 N. FRENCH STREET

PH# (302) 577-8400

by:

CLERK

PETER T. DALLAO
UNITED STATES DISTRICT
COURT DELAWARE
LOCK BOX 18
844 E. KING ST
WILMINGTON, DE 19801

DATE: 8 29- 06

PLAINTIFF Curtis Collins
Smyrna prison